

REMARKS

Claims 1-44 are all the claims pending in the application. By this Amendment, , Applicant adds claims 34-38, which correspond to claims 2-6, except that they depend from claim 7, as opposed to the canceled claim 1. In order to provide more varied protection, Applicant also adds claims 39-44. Claims 39-44 are supported through out the specification, for example, see pages 11-14 of the specification.

In addition, by this Amendment, Applicant cancels claims 1-6, 12 and 29 without prejudice or disclaimer. Moreover, Applicant rewrites claims 7, 13 and 30 in independent form. Applicant also amends claims 14-18 so as to depend on claim 13. Furthermore, Applicant amends claims 8 and 19-22 to fix minor informalities, and amends claim 32 to further clarify the invention.

Preliminary Matters

Applicant thanks the Examiner for acknowledging the claim to foreign priority under 35 U.S.C. §119(e).

Summary of the Office Action

The Examiner objected to the Specification and the Drawings. In addition, the Examiner rejected claims 1, 5, 6, 12, 13, 17, 18, 26-29 and 32 under 35 U.S.C. 102(e) and claims 2-4, 7-11, 14-16, 19-25, 30-31 and 33 under 35 U.S.C. § 103(a).

Drawings

The Examiner has objected to the drawings because Figs. 16-18 are not labeled “Prior Art”. The drawings have been amended to remedy this situation. Replacement Drawings

designating Figs. 16-18 “prior art” are accompanying this response. As a result, the Examiner is respectfully requested to acknowledge receipt and indicate approval of the drawing corrections in the next Patent Office communication.

Specification

The Examiner also objected to the Specification because “YUV system” is not sufficiently described. However, Applicant respectfully submits that YUV is a term of art for a color expression system, where Y stands for the luminance component (the brightness) and U and V are chrominance (color) components. YUV systems are well known in the art and further description is not required. Therefore, Applicant respectfully requests the Examiner to withdraw this objection to the Specification. If the Examiner decides to maintain the objection, Applicant respectfully requests the Examiner to suggest how this objection can be removed in order to expedite prosecution of the application, MPEP § 2164.04.

Claim Rejections Under 35 U.S.C. 102

Claims 1, 5, 6, 12, 13, 17, 18, 26-29, and 32 are rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6, 498,658 to Sekikawa (hereinafter “Sekikawa”). Applicant respectfully traverses this rejection and respectfully requests the Examiner to reconsider this rejection in view of the comments, which follow.

To be an “anticipation” rejection under 35 U.S.C. § 102, the reference must teach every element and recitation of the Applicant’s claims. Rejections under 35 U.S.C. § 102 are proper only when the claimed subject matter is identically disclosed or described in the prior art. Thus,

the reference must clearly and unequivocally disclose every element and recitation of the claimed invention.

Claims 1, 5, 6, 12, and 29 have been canceled. Therefore, this rejection with respect to the canceled claims is literally moot. Of the remaining rejected claims 13, 17, 18, 26-28 and 32, only claims 13, 26 and 32 are independent.

Independent claim 13 recites:

wherein said print data generating section does not manage the number of said and other data acquiring devices, but said data acquiring device control section manages the number of said data acquiring device and other data acquiring devices connected thereto, and

wherein said printing device control section does not manage the number of said and other printing devices, but said print image data generating section manages the number of said printing device and other printing devices connected thereto.

The Examiner asserts that claim 13 is directed to a multifunction printer and is anticipated by Sekikawa. The Examiner asserts that Sekikawa's control part and image reading part are equivalent to the printing device control section and the data acquiring devices, as set forth in claim 13 (see pages 4-5 of the Office Action). Applicant respectfully disagrees with the Examiner. Applicant has carefully studied Sekikawa's discussion of the control part of the digital copier managing the scanner part, which is not similar to a control section managing the number of the data acquiring devices, as set forth in claim 13.

Sekikawa teaches a digital copier with a control part 111, reading part 112 that reads in the images and an image processing part 113, which performs discrimination between various

parts of the image. The control part 111 controls the scanner part 110 (Fig. 1; col. 3, line 60 to col. 4, line 12). However, Sekikawa teaches only one reading part 112, which reads in the images. As such, the number of image reading parts is always one. Since the number of reading parts is always equal to one, Sekikawa's control part 111 need not manage the number of reading parts. In short, Sekikawa fails to teach or suggest a control part which manages the number of reading parts.

Therefore, "*wherein said print data generating section does not manage the number of said and other data acquiring devices, but said data acquiring device control section manages the number of said and other data acquiring devices connected thereto*" as set forth in claim 13, is not suggested or taught by Sekikawa, which lacks having a number of data acquiring devices and lacks a control part managing the number of the data acquiring devices. For at least these reasons, Applicant respectfully submits that independent claim 13 is patentably distinguishable and is not obvious in view of Sekikawa. Applicant therefore respectfully requests the Examiner to withdraw this rejection of independent claim 13. Also, Applicant respectfully submits that claims 17 and 18 are allowable at least by virtue of their dependency on claim 13.

Next, this rejection is respectfully addressed with respect to independent claim 26. Independent claim 26, among a number of unique features, recites: *said storage medium read/write device control section having a dual-use mode permitting reading of image data from said storage medium and writing of image data onto said storage medium and a read-only mode permitting only reading of image data from the storage medium*. The Examiner alleges that claim 26 is directed to a multifunctional printer and is anticipated by Sekikawa. In particular, the

Examiner asserts that Sekikawa's digital copier has the capability of both reading the image data from the memory card and writing the captured image data to the memory card (see page 5 of the Office Action). Applicant has carefully studied Sekikawa's discussion of a digital copier, which is capable of reading data from the memory card and writing captured image data to the memory card, and which is not similar to having a control section that permits the dual-use mode or a read-only mode, as set forth in claim 26.

Sekikawa teaches that input and output of image data between the scanner, printer and a personal computer is possible (col. 4, lines 46 to 49). In particular, Sekikawa teaches that a user may select the input device and the output device by using a digital screen (e.g., Figs. 13, 19 and 28). If the user wishes to print image data stored in a memory card, the user is expected to touch the part of "MEMORY CARD" in the left of the arrow as an input device, then the screen changes to the screen shown in Fig. 19. Since the memory card is intended to store data which should not open to others, when a screen is changed to this screen, the state that the memory card is selected for the output device is canceled and only the printer is set for the output device.

In addition, Sekikawa allows the user to select image data to be outputted by touching the digital screen and selecting "IMAGE DATA SELECTION" option (e.g. Fig. 12; col. 20, lines 40 to 58). Moreover, Sekikawa teaches that images can be scanned in and stored in the memory card (e.g., Fig. 18).

However, Sekikawa only teaches that a user selects the input and output device and the transfer is performed. Once the transfer is performed, the user may select other devices. In other words, Sekikawa has one input device and one output device, thereby disclosing a reading mode or a writing mode. But, in Sekikawa, there is no dual-use mode, permitting reading image data

from a device and writing image data to that same device. In other words, Sekikawa only teaches the memory card being in a write mode or a read mode depending on the user's selection. In short, Sekikawa fails to unequivocally disclose having a dual-use mode and a read-only mode where the control section permits one or the other mode, as set forth in claim 26.

Therefore, "*said storage medium read/write device control section having a dual-use mode permitting reading of image data from said storage medium and writing of image data onto said storage medium and a read-only mode permitting only reading of image data from said storage medium*" as set forth in claim 26, is not suggested or taught by Sekikawa, which lacks having a control section permitting either a dual-use mode or a reading-only mode. For at least these reasons, Applicant respectfully submits that independent claim 26 is patentably distinguishable and is not obvious in view of Sekikawa. Applicant therefore respectfully requests the Examiner to withdraw this rejection of independent claim 26. Also, Applicant respectfully submits that claims 27-28 are allowable at least by virtue of their dependency on claim 26.

Finally, independent claim 32 recites: *managing number of said and other data acquiring device connected to the computer and managing number of said and other printing device connected to the computer*. This recitation is similar to the limitation of managing a number of data acquiring devices and a number of printing devices recited in claim 13. Since claim 32 contains features that are similar to the features argued above with respect to claim 13, those arguments are respectfully submitted to apply with equal force here. For at least substantially the same reasons, therefore, Applicant respectfully requests the Examiner to withdraw this rejection of independent claim 32.

Claim Rejections Under 35 U.S.C. 103(a)

Claims 2-4, 7-11, 14-16, 19-25, 30-31 and 33 stand rejected under 35 U.S.C. § 103(a). In particular, claims 2 and 15 are rejected under 35 U.S.C. 103(a) as being unpatentable over Sekikawa in view of U.S. Patent No. 6,134,021 to Silverbrook (hereinafter "Silverbrook"), claims 3 and 16 are rejected as being unpatentable over Sekikawa, and claims 4, 7-11, 14, 19-25, 30-31 and 33 as being unpatentable over Sekikawa in view of U.S. Patent No. 6,141,111 to Kato (hereinafter "Kato"). Applicant respectfully traverses these rejections and respectfully requests the Examiner to reconsider in view of the following comments.

Sekikawa and Silverbrook

The Examiner rejected claims 2 and 15 as being unpatentable over Sekikawa in view of Silverbrook. Claim 2 has been canceled. Therefore, this rejection is literally moot with respect to claim 2. With respect to claim 15 which depends on claim 13, Applicant respectfully traverses this rejection. Applicant has already demonstrated that Sekikawa does not meet all the requirements of independent claim 13. Silverbrook is relied upon only for its teaching of a color copier with a memory card for storing input image data (see page 7 of the Office Action). Clearly, Silverbrook does not compensate for the above-identified deficiencies of Sekikawa. Together, the combined teachings of these references would not have (and could not have) led the artisan of ordinary skill to have achieved the subject matter of claim 13. Since claim 15 depends on claim 13, it may be patentable at least by virtue of its dependency.

Sekikawa

The Examiner rejected claims 3 and 16 as being unpatentable over Sekikawa. Claim 3 has been canceled, and therefore, this rejection is literally moot with respect to claim 3. With

respect to claim 16, which depends on claim 13, Applicant has already demonstrated that Sekikawa does not teach or suggest all features of the independent claim 13. Since claim 16 depends on claim 13, it may be patentable at least by virtue of its dependency.

Sekikawa and Kato

The Examiner rejected claims 4, 7-11, 14, 19-25, 30-31 and 33 as being unpatentable over Sekikawa in view of Kato. Claims 4 has been canceled. Therefore, this rejection is literally moot with respect to claim 4. With respect to the remaining rejected claims 7-11, 14, 19-25, 30-31 and 33, Applicant respectfully traverses this rejection and respectfully requests the Examiner to reconsider in view of the following comments.

Independent claim 7 recites: *wherein said data acquiring device and said printing device are held in a common housing, and said data acquiring device and said printing device hold identification information indicating that said data acquiring device and said printing device are held in said common housing.* The Examiner acknowledges that Sekikawa fails to teach or suggest these features of claim 7. However, the Examiner alleges that Kato cures the deficient teachings of Sekikawa (see page 11 of the Office Action). In particular, the Examiner alleges that Kato teaches a scanner and a variety of printers and distinguishing between various devices inherently teaches detecting whether the two are held in a common housing (see page 11 of the Office Action). Applicant respectfully disagrees with the Examiner. Applicant has carefully studied Kato's discussion of the printing devices and a display panel, which are not similar to a printing device and a data acquiring device with identification information, as set forth in claim 7.

Kato teaches an image printing system with a scanner to read document images, and a number of various printers (26-29) to print the image (Fig. 1; col. 3, lines 28 to 65). Image printer 26 is a color digital copier with a scanner 3 and a printer 4. Interface 2 controls input and output of the image data for the scanner 3 and the printer 4 (Fig. 1; col. 3, lines 42 to 56). Kato further teaches storing print management data in main memory 7 of image printer 26 (Fig. 2; col. 4, lines 9 to 15). In particular, the management data includes a different printer network address for each printer (Fig. 3C; col. 4, lines 44 to 53). However, in Kato, a printer network address is assigned for each image printer (26-29) and not for the scanner and the printer inside the image printer (digital copier 26). Kato's scanner and the printer do not hold a network address. Moreover, Kato clearly fails to teach or suggest the scanner and the printer holding information that would indicate that they are in the common housing.

Therefore, "*wherein said data acquiring device and said printing device are held in a common housing, and said data-acquiring device and said printing device hold identification information indicating that said data acquiring device and said printing device are held in said common housing*" as set forth in claim 7 is not suggested or taught by Sekikawa and Kato, taken alone or in any conceivable combination, which lack having an acquiring device and a printing device storing identification information that would indicate that the two are in the same housing. Together, the combined teachings of these references would not have (and could not have) led the artisan of ordinary skill to have achieved the subject matter of claim 7.

For at least these reasons, Applicant respectfully submits that independent claim 7 is patentable over Sekikawa in view of Kato. Applicant therefore respectfully requests the

Examiner to withdraw this rejection of independent claim 7. Also, Applicant respectfully submits that claims 8-11 are allowable at least by virtue of their dependency on claim 7.

In addition, dependent claim 8 recites: *wherein said data acquiring device and said printing device held in the common housing, hold a common serial number used as said identification information.* The Examiner alleges that Kato's network address is similar to the identification information, as set forth in claim 8 (see page 11 of the Office Action). However, Applicant respectfully submits that Sekikawa fails to teach the above described recitation and that Kato fails to cure the deficient teachings of Sekikawa. Kato only teaches a network address different for each printer and it clearly fails to teach or suggest the scanner and the printer within the digital copier holding the claimed identification information, especially a common serial number. The combined teachings of Sekikawa and Kato fail to teach or suggest having an acquiring device and a printing device storing a common serial number, as set forth in the dependent claim 8. In short, dependent claim 8 is patentable for at least this additional reason.

Next, Applicant respectfully addresses this rejection with respect to claim 14, which depends on claim 13. Independent claim 13 recites: *wherein said print image data generating section does not manage the number of said data acquiring device and other data acquiring devices, but said data acquiring device control section manages the number of said data acquiring device and other data acquiring devices connected thereto, and wherein said printing device control section does not manage the number of said printing device and other printing devices, but said print image data generating section manages the number of said printing device and other printing devices connected thereto.* Applicant has already demonstrated that Sekikawa does not teach or suggest the above describe recitation. Kato is cited only for its

teachings of an identification information and as such fails to cure the deficient teachings of Sekikawa. In short, the combined teachings of these references would not have (and could not have) led the artisan of ordinary skill to have achieved the subject matter of claim 13. As a result, claim 14 is allowable at least by virtue of its dependency on claim 13.

Next, Applicant respectfully traverses this rejection with respect to claims 19-25. Of these claims only claim 19 is independent. Claim 19 recites: *a comparing section that compares said data acquiring device identification information with said printing device identification information to judge whether said both devices are held in a common housing or not*. The Examiner alleges that Kato teaches identification numbers and that Sekikawa teaches all other features recited in claim 19. In particular, the Examiner alleges that Sekikawa teaches a comparing section which can judge whether or not the data acquiring device and the printing device are held in the common housing (see pages 9-10 of the Office Action).

Applicant respectfully disagrees with the Examiner. Applicant has carefully studied Sekikawa's discussion of the digital copier with a memory card and Kato's discussion of network addresses, which are not similar to judging whether the printing device and the data acquiring device are held in a common housing by comparing identification information of the two devices, as set forth in claim 19.

Sekikawa teaches a digital copier which judges whether or not the memory card is inserted in a card connector 118 but the digital copier does not *judge whether or not* the memory card and the image reading part are held in a common housing because the memory card and the image reading part are always in the common housing. In short, Sekikawa fails to teach or suggest judging whether or not the data acquiring device and the printing device are held in the

common housing, as set forth in claim 19. Kato only teaches network addresses and clearly fails to cure the deficient teachings of Sekikawa.

Therefore, “*a comparing section that compares said data acquiring device identification information with said printing device identification information to judge whether said both devices are held in a common housing or not*” as set forth in claim 19, is not taught or suggested by the combined teachings of Sekikawa and Kato. Together, the combined teachings of these references would not have (and could not have) led the artisan of ordinary skill to have achieved the subject matter of claim 19. For at least these reasons, Applicant respectfully requests the Examiner to reconsider and withdraw this rejection of independent claim 19 and its dependent claims 20-25.

Independent claim 30 and its dependent claim 31 recite features similar to the features argued above with respect to claims 7 and 8, respectively. Namely, claim 30 recites: *wherein said computer is capable of recognizing said data acquiring device and said printing device as independent devices, said data acquiring device and said printing device are held in a common housing, and said data acquiring device and said printing device each hold identification information indicating that they are held in the common housing* and claim 31 recites: *wherein said data acquiring device and said printing device held in a common housing have a common serial number, and said serial number is used as said identification information*. Since claims 30 and 31 contain features that are similar to the features argued above with respect to claims 7 and 8, respectively, those arguments are respectfully submitted to apply with equal force here. For at least substantially the same reasons, therefore, Applicant respectfully requests the Examiner to withdraw this rejection of independent claim 30 and its dependent claim 31.

Finally, independent claim 33 recites: *comparing said data acquiring device identification information with said printing device identification information, and thereby judging whether both these devices are held in a common housing or not.* This recitation is similar to the limitation of judging whether or not the data acquiring device and the printing device are held in the common housing recited in claim 19. Since claim 33 contains features that are similar to the features argued above with respect to claim 19, those arguments are respectfully submitted to apply with equal force here. For at least substantially the same reasons, therefore, Applicant respectfully requests the Examiner to withdraw this rejection of independent claim 33.

New Claims

New claims 34-38 are patentable at least by virtue of their dependency on claim 7. New claim 39 is patentable at least because it recites: *"the data acquiring device control section, and not the print image data generating section, manages the number of the one or more data acquiring devices; and the print image data generating section, and not the printing device control section, manages the number of the one or more printing devices."* New claims 40-44 are patentable at least by virtue of their dependency on claim 39.

Conclusion

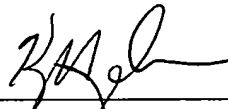
In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly invited to contact the undersigned attorney at the telephone number listed below.

Amendment Under 37 C.F.R. § 1.111
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